

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: : **CHAPTER 13**
WILLIAM HARVEY GOODLING :
fdbा William H. Goodling Construction : **CASE NO. 1:21-bk-01819**
KELLY JEAN GOODLING :
Debtors :
:

MOTION FOR ORDER TO PAY TRUSTEE

Come now, William Harvey Goodling and Kelly Jean Goodling by and through Mott & Gendron Law and request an Order to pay Trustee, respectfully representing in support thereof:

1. The Debtors filed a Chapter 13 petition on August 18, 2021 at the above-captioned docket number.
2. The Debtors receive regular income from employment which may be attached under 11 U.S.C. Section 1326 to fund the Chapter 13 Plan.
3. The likelihood of success in this case will be much greater if the income is attached to fund the Plan.
4. The Debtors consent to the wage attachment.

Wherefore, the Debtors respectfully request that this Court enter an Order to pay Trustee in the form attached.

Respectfully submitted,

/s/ Dorothy L. Mott

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/s/ William Harvey Goodling

/s/ Kelly Jean Goodling

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ORDER TO PAY TRUSTEE

Upon consideration of the Motion for Wage attachment, it is hereby ordered that until further Order of this Court the entity from whom the Debtor, Kelly Jean Goodling, receives income:

CARLISLE INC
ATTN: PAYROLL DEPARTMENT
16430 N SCOTTSDALE RD, STE 400
SCOTTSDALE, AZ 85254

deduct from said income the sum of \$1,071.00 from each two-week pay check, or \$535.50 from each weekly paycheck, as appropriate, beginning on the next pay day following receipt of this Order and deduct a similar amount each pay period thereafter, including any period from which the Debtor receives a periodic or lump sum payment as a result of vacation, termination or other benefits arising out of present or past employment, or from any other benefits payable to the Debtor and to remit the deductible sums to:

JACK N. ZAHAROPOULOS ESQUIRE
CHAPTER 13 TRUSTEE
PO BOX 6008
MEMPHIS, TN 38101-6008

and to change the amount of the monthly remittance to the Trustee in the future, if the Employer is directed to do so in writing, either by the Trustee or by the Debtor's counsel and to continue the monthly wage attachment until the Employer is directed in writing to discontinue the attachment, either by the Trustee or Debtor's counsel.

It is further ordered that the employer shall change the amount of the monthly remittance to the Trustee in the future, if the Employer is directed to do so in writing, either by the Trustee or by the Debtor's counsel and to continue the monthly wage attachment until the Employer is directed in writing to discontinue the attachment, either by the Trustee or Debtor's counsel.

It is further ordered that the entity from whom the Debtor receives income shall notify the Trustee if the Debtor's income is terminated and the reason therefore.

It is further ordered that all remaining income of the Debtor, except the amounts required to be withheld for taxes, social security, insurance, pension, or union dues be paid to the Debtor in accordance with usual payment procedure.

It is further ordered that this Order shall terminate without further order upon certification that the obligation of the Debtor has been fulfilled, if it is not terminated by earlier order of this Court.